

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SARAH R. LONDON IN  
SUPPORT OF PLAINTIFF'S OPPOSITION  
TO UBER'S MOTION TO QUASH TRIAL  
DEPOSITIONS**

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

Judge: Honorable Charles R. Breyer  
Date: TBD  
Time: TBD  
Courtroom: 6 –17th Floor

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and  
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of  
4 the State Bar of California and am admitted to practice before this Court. I make this declaration  
5 based on my own personal knowledge. If called upon to testify, I could and would testify  
6 competently to the truth of the matters stated herein.

7 2. I submit this declaration in support of Plaintiff's Opposition to Uber's Motion to  
8 Quash Trial Depositions.

9 3. The exhibits referred below are attached to Plaintiff's Opposition to Uber's  
10 Motion to Quash Trial Depositions. They are filed under seal in connection with Plaintiff's  
11 Administrative Motion to Consider Whether Another Party's Material Should be Sealed.

12 4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the  
13 March 26-27, 2025, 30(b)(6) Deposition of Gus Fuldner.

14 5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the May  
15 7, 2025, 30(b)(6) Deposition of Katy McDonald.

16 6. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the June  
17 25, 2025, 30(b)(6) Deposition of Sunny Wong.

18 7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the  
19 October 14, 2025, 30(b)(6) Deposition of Sunny Wong.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
21 17th day of December, 2025 in San Francisco, California.

22  
23 /s/ Sarah R. London  
24 Sarah R. London  
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